

From: driverjh@comcast.net
To: [Biggio, Patricia](#); "[Joseph Conti](#)"
Cc: "[Anna McGrath](#)"; [Friedman, Dana](#); [Godshall, Joshua](#); "[Yasushi Takeda](#)"; "[William Fornshell](#)"; driverjh@comcast.net
Subject: RE: Call to discuss TCVP
Date: Friday, May 08, 2020 8:35:30 AM
Attachments: [image002.png](#)
[TCVP EPA Residential SOPs Hartz Pet Collar Assessment Update FINAL 07May20.xlsx](#)
Importance: High

Good morning Trish!

Please find attached our updated EPA SOP spreadsheet, reflecting refinements to the cancer risk estimation (adults). The non-cancer assessment for children is still included too.

Joe will be submitting the associated report to you today and via the portal.

We would be pleased to discuss the final report and EPA SOP assessment/sheet with you, Dana, Joshua and others.

Have a great Friday, and a great weekend!

Sincerely,
Jeff

Jeffrey H. Driver, DrPH, DABT, MT, CLS
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From: driverjh@comcast.net <driverjh@comcast.net>
Sent: Thursday, May 7, 2020 1:13 PM
To: 'Biggio, Patricia' <biggio.patricia@epa.gov>; 'Joseph Conti' <jconti@hartz.com>
Cc: 'Anna McGrath' <amcgrath@hartz.com>; 'Friedman, Dana' <Friedman.Dana@epa.gov>; 'Godshall, Joshua' <Godshall.Joshua@epa.gov>; 'Yasushi Takeda' <ytakeda@hartz.com>; 'William Fornshell' <wfornshell@hartz.com>; 'driverjh@comcast.net' <driverjh@comcast.net>

Subject: RE: Call to discuss TCVP

Hi again Trish et al.!

We have reviewed and refined our assessment for the cancer risk estimation. We will be emailing the update spreadsheet soon, report will follow soon after.

Happy Thursday!

Jeff

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From: driverjh@comcast.net <driverjh@comcast.net>

Sent: Wednesday, May 6, 2020 3:58 PM

To: 'Biggio, Patricia' <biggio.patricia@epa.gov>; 'Joseph Conti' <jconti@hartz.com>

Cc: 'Anna McGrath' <amcgrath@hartz.com>; 'Friedman, Dana' <Friedman.Dana@epa.gov>; 'Godshall, Joshua' <Godshall.Joshua@epa.gov>; 'Yasushi Takeda' <ytakeda@hartz.com>; 'William Fornshell' <wfornshell@hartz.com>; 'driverjh@comcast.net' <driverjh@comcast.net>

Subject: RE: Call to discuss TCVP

Importance: High

Hi Trish!

Thanks very much for organizing the meeting and to all those participating.

Per our discussion, attached are pet collar trimming results for studies with dogs and cats. The dog study was submitted to EPA (MRID 51079500-01), whereas the cat study is ongoing, but the summary results are attached.

Also, regarding cancer risk estimation, I should have pointed out that the dermal absorption value of

9.6% in the spreadsheet is a value from a rat study. This a source of overestimation bias for the cancer risk estimates. Currently there are dozens of pesticide-specific examples of the conservatism resulting from using rat dermal absorption in lieu of human dermal absorption data, e.g., in vitro measurements . The known differential dermal absorption between rats and humans averaged 5-fold when tabulated 15 years ago (Ross et al., 2001), and has not substantively changed as more data have been developed.

Best regards,
Jeff

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From: Biggio, Patricia <biggio.patricia@epa.gov>
Sent: Wednesday, May 6, 2020 11:38 AM
To: Joseph Conti <jconti@hartz.com>
Cc: Anna McGrath <amcgrath@hartz.com>; Friedman, Dana <Friedman.Dana@epa.gov>; Godshall, Joshua <Godshall.Joshua@epa.gov>; Dr. Jeffrey Driver <DriverJH@comcast.net>; Yasushi Takeda <ytakeda@hartz.com>; William Fornshell <wfornshell@hartz.com>
Subject: RE: Call to discuss TCVP

All,

Representatives from HED will be on the call. Please use the following number for today's meeting at 3:00 pm EST.

Conference phone number: Ex. 6 PP - conference code/call in number
Conference ID: Ex. 6 PP - conference code/call in number

Regards,
Trish

From: Joseph Conti <jconti@hartz.com>

Sent: Wednesday, May 6, 2020 10:42 AM

To: Biggio, Patricia <biggio.patricia@epa.gov>

Cc: Anna McGrath <amcgrath@hartz.com>; Friedman, Dana <Friedman.Dana@epa.gov>; Godshall, Joshua <Godshall.Joshua@epa.gov>; Dr. Jeffrey Driver <DriverJH@comcast.net>; Yasushi Takeda <ytakeda@hartz.com>; William Fornshell <wfornshell@hartz.com>

Subject: Re: Call to discuss TCVP

Trish,

I left message but wanted to follow-up with email. Jeff is available today at 3 but our attorney is not. We would be happy to have a scientific discussion and walk you through the assessment information we plan to provide within the week. Jeff and I thought it would be helpful if Wade Britton and Kelly Lowe who have done much of the work were available for the call if possible. Please provide a call in number and advise who will be present from EPA. Based on the short notice, I am not sure if Yas Takada is available and he may join call.

JoeConti

Sr. Director Regulatory, Research & Development

On Wed, May 6, 2020 at 9:37 AM Biggio, Patricia <biggio.patricia@epa.gov> wrote:

Anna, Joe -

Based on our last conversation on April 24, 2020, we understand that Hartz may have additional information on the TCVP pet products. We would like to schedule a call today or tomorrow as we are speaking with our leadership more to develop a response to the NRDC's petition as ordered by the Ninth Circuit Court on April 22, 2020. Please let us know if you are available at one of the following times:

- Today, May 6, 3:00 to 4:00 pm Eastern Standard Time
- Tomorrow, May 7, 11:00 am to 12:00 pm Eastern Standard Time

We will provide a conference line once a day and time have been confirmed.

Thank you,
Trish

Patricia Biggio
Chemical Review Manager
Pesticide Re-evaluation Division
Office of Pesticide Programs, EPA
Phone: 703-347-0547

biggio.patricia@epa.gov



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